

Dear FTC:

I have been an IBO for over 3 years now. And I have met my first goal of making my business profitable on a basic month to month 'net vs. overhead' accounting standpoint. I have learned that the more people I serve and help, the more I am rewarded down the road. When I first got started I was given excellent information on the Quixtar business opportunity and everything they promised to make available, was indeed there. And in fact, the business relationships and provisions have only improved significantly over the last 3 years. What I love is that I can take my otherwise unproductive time outside of my 'regular job' and help others with good purchasing options, or with learning the art of business for themselves. I myself have learned so much about business it's really priceless, yet I have not had to go into debt for tuition like I would at a University.

In addition to the little bit of extra equity I've been able to create through my Quixtar business, the biggest benefit is who I have become through the process and the fruit that has shown in the rest of my professional and social life. I now make over double in my regular day job as I did 3 years ago. I owe that to the professional development and association with other successful IBO's. I also am a better friend to my community by far compared to 3 to 4 years ago.

Of course I do my very best to present complete and accurate information to anyone interested in owning their own business and are looking at the same opportunity I have chosen. I love to be transparent about my own income and benefits I receive from my business, but a prospective partner would not and should not be limited in their thinking to just my own performance, because they most certainly can out perform me by a long shot if they work harder and/or work smarter than me. In addition, I am VERY clear to any prospects that I can not and do not offer any kind of 'get-rich-quick' idea. I communicate clearly that only diligent hard work will achieve the rewards that can surpass most job situations out there. And of course they can easily meet people who have done so if they so choose. This info is in the written material I provide, and is something I always verbally share with them.

If someone chooses to get started in our business, they can do so for less than \$200 easily. Depending on if they want to aggressively launch or just ease into it. Typically that initial investment is recouped through profit in less than two months if they put reasonable effort in. If at any time they decide not to pursue their business, I am always happy to refund them 100% of their initial investment money.

Due to all the above reasons, I think it would be most unwise and ineffective to impose a '7 day' waiting period on registrations. First it would be very difficult to regulate and therefore on the most honest and honorable business owners and promoters would abide by it, thereby giving some undo advantage to business promoters that choose to grow their businesses without regard to regulations.

And about the idea of giving references, it really only makes sense in the reverse for our business. Because when an IBO registers with Quixtar, it is the sponsoring IBO that is taking on

the most risk and responsibilities of serving and assisting the newer IBO. Therefore if references should be given, they should be given by the prospect actually.

What if one of my prospects might (even accidentally) register with one of the references instead of me? That would not be fair and would cause unreasonable confusion!!

In addition, I believe a requirement for other sponsored IBO's to be giving away my contact information to who know who would be a pretty major violation of my privacy.

In fact, before any IBO registers through me, I always have them meet as many other IBO's as is practical when we are at a Seminar together. The prospect has the opportunity and is encouraged to meet as many IBO's as they desire and ask any and all questions they might want to ask. This way they get more objective information from someone who would have no material benefit whether they choose to start their business up or choose not to.

Honestly, the requirement to provide a "Litigation List" only makes sense if the requirement applies only to any litigation against me or my own Quixtar powered business. All information on the credit worthiness and character of the Servicing Corporation is available to many reputable sources such as the BBB-online, and Business 2.0 etc. etc. If you were to set up a rule about litigation disclosure you would have to be fair by requiring all companies who hire or partner with any individual to also disclose all current and past litigation. Imagine Wal-Mart having to disclose all that to every person they wished to hire to work in a Wal-Mart store!! Plus ONLY actual completed rulings are even of any worth, because mere allegations are worthless. Our justice system is founded on the principle of 'innocent until proven guilty.' Please remember that!!

Now as to the requirement for earnings disclosures, we already do that with a form we call the WSA4400, that is already FTC reviewed and that is an integral part of how every prospect learns about my business opportunity. If anyone is going to be a business partner of mine, then of course my own experience and financial benefits I derive from the running of my own business are something I could easily share in general terms. As a small business, the same kind of reporting that public companies do to the SEC would be both burdensome and would be a bit of an invasion of privacy. The prospect would have to somehow EARN the right to be privileged enough to see such details of a private business. Plus it is only the Average earnings of truly active and working IBO's that is really meaningful to a potential IBO, because profit is directly proportionate to the actual effort and skill of the individual IBO, as with any business.

Thank you for listening to my opinions on this matter,

Timothy D. Ganstrom
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In association with Quixtar